



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

March 15, 2004

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P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Philips Products, Inc. / 039-18721-00128

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER-AM.dot 9/16/03

March 15, 2004

Mr. Dennis Ruben  
Philips Products, Inc.  
23400 Magnum Drive  
P. O. Box 232  
Elkhart, IN 46516

Re: **039-18721**  
Notice-only change to  
**MSOP 039-14462-00128**

Dear Mr. Ruben:

Philips Products, Inc. was issued a Minor Source Operating Permit (MSOP) on October 25, 2001, for a steel doors, RV doors, storm doors and vinyl windows manufacturing plant. A letter requesting the Office of Air Quality for certain changes was received on February 10, 2004. One of the requests was that the record keeping requirements in the permit be modified to change the monthly VOC and HAP usage record keeping for each production line to an aggregate annual record keeping for the entire source. After careful review of the permit terms and conditions, Office of Air Quality has decided to decline this request, because the record keeping for these units are related to specific and separate emissions limits under separate rules, such as 326 IAC 8-1-6 and 326 IAC 2-7. According to 326 IAC 2-6.1-6(d)(2), a notice-only change is appropriate for "a change in descriptive information concerning the source or emission unit or units. The other requested changes meet this requirement, therefore, pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.2 and the facility description in Section D.1 are modified to delete Plant 2 activities.

~~Plant 2 - located at 1000 Sako Court, Elkhart, Indiana:~~

- ~~(a) One (1) wood stiles assembly area, with a maximum capacity of 125 doors per hour, equipped with one (1) baghouse for particulate control;~~
- ~~(b) One (1) door core foam filling operation; and~~
- ~~(c) Four (4) volatile organic liquid (VOL) storage tanks, each with a maximum capacity of 2,000 gallons, and each with an annual throughput of 35,000 gallons per year.~~

(2) Section D.1.4(b) is modified to remove the PM emissions limit for the wood stiles area in Plant 2 as follows:

Pursuant to 326 IAC 6-3-2, the PM emissions from the source operations shall be limited as follows:

Process	Process Weight Rate (ton/hr)	PM Allowable (lb/hr)
Welding	0.0008 0.551	
Storm & RV Doors Woodworking	0.01	0.551
<del>Wood Stiles Assembly</del>	<del>0.3815</del>	<del>2.15</del>
Material Cutting and Routing	0.985	4.05

(3) Section A.2(f) is modified as follows:

- (e) One (1) natural gas-fired rapid air make-up unit, identified as S9 with a heat input capacity of 3.3 mmBtu/hr; and
- (f) PM/PM10 emissions from the MH/RV fiberglass, steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collectors DC2 (**located outdoors**) and DC3;

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik at (800) 451-6027, press 0, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

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cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector- Tony Pelath  
Compliance Data Section  
Administrative and Development

# **MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY**

**Philips Products  
3221 Magnum Drive  
Elkhart, Indiana 46516**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-14462-00128	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 25, 2001

1 <sup>st</sup> Notice-Only Change: 039-18721		Pages Modified: 4, 14, 15
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 15, 2004	

- (c) One (1) home HTD/storm door production line with a maximum production rate of 20 units per hour. This line includes; metal cutting with a maximum cutting rate of 450 pounds per hour, application of sealant, and woodworking operation which is controlled by baghouse DC1;
- (d) Two (2) natural gas-fired applied air heating unit, identified as S3 and S7 each has a heat input capacity of 3.125 million British Thermal Units per hour (mmBtu/hr);
- (e) One (1) natural gas-fired rapid air make-up unit, identified as S9 with a heat input capacity of 3.3 mmBtu/hr; and
- (f) PM/PM10 emissions from the MH/RV fiberglass, steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collectors DC2 (located outdoors) and DC3;

A.3 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is not required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is not a major source, as defined in 326 IAC 2-7-1(22);

## SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Plant 1 - located at 3221 Magnum Drive, Elkhart, Indiana:

- (a) One (1) RV doors production line, with a maximum production rate of 70 units per hour. This line includes the following operations:
  - (1) Inner frame steel cutting with a maximum cutting rate of 240 pounds per hour;
  - (2) Skin foam cutting with a maximum cutting rate of 120 pounds per hour;
  - (3) Outer frame aluminum cutting with a maximum cutting rate of 890 pounds per hour;
  - (4) Surface coating using aerosol and plews cans at a maximum rate of 70 units per hour
- (b) One (1) vinyl windows production line for RVs and homes with a maximum production rate of 75 units per hour. This line includes the following operations:
  - (1) Spacer cutting with a maximum cutting rate of 75 pounds per hour;
  - (2) Grid cutting with a maximum cutting rate of 25 pounds per hour;
  - (3) Glass cutting with a maximum cutting rate of 1400 pounds per hour;
  - (4) Frame parts cutting with a maximum cutting rate of 200 pounds per hour;
  - (5) Sash parts cutting with a maximum cutting rate of 100 pounds per hour;
  - (6) Weld frame through heat fusion and surface coating.
- (c) One (1) home HTD/storm door production line with a maximum production rate of 20 units per hour. This line includes; metal cutting with a maximum cutting rate of 450 pounds per hour, application of sealant, and woodworking operation which is controlled by baghouse DC1;
- (d) Two (2) natural gas-fired applied air heating unit, identified as S3 and S7 each has a heat input capacity of 3.125 million British Thermal Units per hour (mmBtu/hr);
- (e) One (1) natural gas-fired rapid air make-up unit, identified as S9 with a heat input capacity of 3.3 mmBtu/hr; and
- (f) PM/PM10 emissions from the MH/RV fiberglass, steel, aluminum, foam cutting, routing and woodworking operations are controlled by dust collectors DC2 (located outdoors) and DC3;

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D 1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The VOC potential emissions from the Vinyl Windows Production Line are less than 25 tons per year. Therefore, the Best Available Control Technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply. Any change or modification which may increase the Vinyl Windows Production Line VOC potential emissions to 25 tons per year or more shall obtain OAQ approval before such change may occur.

#### D.1.2 Hazardous Air Pollutant (HAPs) [326 IAC 2-7]

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The single HAP and combined HAPs potential emissions from the source are less than 10 tons per year and 25 tons per year respectively. Therefore, 326 IAC 2-7 (Part 70 Permit Program) does not apply. Any change or modification which may increase each single HAP or combined HAPs emissions to 10 tons per year or more or 25 tons per year or more from the source shall obtain OAQ approval before such change may occur, and be subject to 326 IAC 2-7.

#### D.1.3 Volatile Organic Compounds (VOCs) [326 IAC 8-2-9]

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The actual volatile organic compound (VOC) emissions from the metal HTD storm door production line, and the RV door production lines are each less than 15 pounds per day before add-on control. Therefore 326 IAC 8-2-9 (Miscellaneous Metal Coating) does not apply. Any change which may increase each actual VOC emissions from these production lines shall obtain OAQ approval before such change may occur, and be subject to 326 IAC 8-2-9.

#### D.1.4 Particulate Matter 326 IAC 6-3-2 (Process Operations)

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- (a) Pursuant to 326 IAC 6-3-2, the PM emissions from the HTD Storm Door production line, RV Door Production Line and the RV's and Homes Vinyl Window Production Line when using spray type application system, and shall be limited using the following equation: Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

- (b) Pursuant to 326 IAC 6-3-2, the PM emissions from the source operations shall be limited as follows:

Process	Process Weight Rate (ton/hr)	PM Allowable (lb/hr)
Welding	0.0008	0.551
Storm & RV Doors Woodworking	0.01	0.551
Material Cutting and Routing	0.985	4.05

The above PM emission limits shall be determined using the following equation: Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

#### D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

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A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for this emissions unit and any control devices.

### Compliance Determination Requirements

#### D.1.6 Testing Requirements [326 IAC 2-1.1-11]

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The Permittee is not required to test the above emission units by this permit. However, IDEM